



ECKERLE
E-MOTION TECHNOLOGY

Eckerle Code of Conduct



Foreword

**Dear Readers,
Dear Staff,**

In recent months we have been working with our shareholders to define our goals for the coming years and the necessary implementation strategy. In the near future, Eckerle will develop into the technology leader in our market segments. We will build on existing products and process know-how and supplement these with new products and new technologies.

Eckerle is a family business in the Prettl Group. In a time of dramatic and constant change, we have a clear strategic direction that is designed for growth, and at the same time we are committed to solid values and binding principles. We practice the values of a global family company.

Integrity, fairness and mutual respect in business dealings have always been the basis of our daily work.

Our management principles are based on trust, reliability, transparency and consistency in our mutual teamwork.

Despite our growth trajectory, we do not do business at any price. We do not accept any unethical behavior or violations of laws and rights on the part of our employees or our business partners. This is the only way we can build trust and work together in the future.

We are all responsible for the future of the Eckerle Group and for future generations. Accordingly, we must act and make decisions for the long term and within the framework of the applicable laws and regulations.

Sustainability, and work, climate and environmental protection are all important concerns for us, and we include these considerations in our decisions and actively encourage them.

Dear Staff and Business Partners,

The Eckerle Code of Conduct outlines the values and behavior that we expect from our employees and business partners. We have created it as a guide, in the knowledge that, for many people, the points covered are already a matter of course nowadays. However, it is important for us to inform you of this Corporate Code, and we expect that violations of it will be reported to management or HR in accordance with Section 6 of this agreement.

Thank you for your personal support in implementing this Code and complying with it.

Ottersweier, December 10th, 2021



Michael Follmann (CEO)



Andreas Göhring (CFO)

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1. BASIC PRINCIPLES AND BEHAVIOR REQUIREMENTS

1.1. Integrity

Integrity means that Eckerle's business practices are always in line with the company's values and principles of conduct. Eckerle and its employees comply with both applicable law and internal regulations. They act according to the corporate values and follow their internal compasses so that rules become values that are actively put into practice.

Eckerle and its employees maintain integrity when dealing with others and also expect integrity from business partners.

Eckerle only maintains business relationships with third parties whose business practices correspond to the values and principles of behavior presented in this Code of Conduct, thereby protecting the company and its employees from criminal or other liability and safeguarding Eckerle's good reputation.

1.2. Trust, Reliability, Transparency and Consistency

Eckerle is a fair and reliable partner. Eckerle and its employees therefore act transparently toward their shareholders, business partners and each other.

Transparency creates trust, and trust is the basis for successful long-term cooperation.

For us, reliability means that we do what we have agreed on. Responsible cooperation requires actions and decisions that are transparent and comprehensible. Only then will the necessary acceptance be achieved. When it comes to working together, transparency also means addressing issues openly and dealing honestly with one another. Consistency is also a part of honesty. We respect the fact that mistakes can be made. It is important for us to learn from such mistakes in order to continuously improve. However, if this is not put into practice, or if this Code is deliberately violated, then to the applicable consequences will ensue.

1.3. Compliance with Applicable Law

Eckerle and its employees respect and comply with all applicable local, national and international laws and regulations. Compliance with these laws and regulations is the basis for Eckerle's long-term economic success. Violations of these laws and regulations can lead to considerable damage and have serious consequences for the company, employees, business partners and shareholders alike.

1.4. Risk Management

In order to implement its corporate strategy and realize the associated opportunities, Eckerle takes calculated business risks with due caution. Business success generally requires that opportunities are exploited and that any associated risks are identified, evaluated and managed at an early stage.

Eckerle understands risks to be the negative contingencies, events or actions which will prevent the company from achieving its plans or successfully implementing its strategy.

Risks are actively managed with the help of the Risk Management System implemented within the Eckerle Group (see IATF 16949). Dealing with risks is carried out at all corporate and business levels by consistent risk management and the regular monitoring of risk-driving factors.

In this way, we ensure ongoing risk awareness at all levels of the company and throughout the Group, and additionally strengthen the risk culture that is practiced. It is the responsibility of every employee to appropriately manage business risks within the framework of responsibilities assigned to them. Individual risks that may jeopardize the continued existence of the company are not accepted.

1.5. Avoiding Conflicts of Interest

Eckerle expects loyalty and integrity from all its employees. This means that all members of staff act in the interests of Eckerle and make business decisions in the best interests of the company as part of their employment in the company. Personal or financial interests must not negatively influence or impair the interests of Eckerle.

Accordingly, employees should avoid situations in which personal interests and actions come into conflict with the interests of the company. If conflicts of interest are unavoidable, employees must report them and, together with their manager, seek a solution that protects Eckerle's interests.

1.6. Respect for Human Rights

Respect for human rights is an integral part of Eckerle's corporate responsibility. The company is committed to the United Nations International Code of Human Rights, the «UN Guiding Principles on Business and Human Rights», the ten principles of the «UN Global Compact» and the internationally recognized standards of the eight core labor standards of the International Labor Organization (ILO).

Accordingly, all employees must respect the dignity and personal rights of the individual as well as all stakeholders with whom the company is connected through its activities, business relationships or products. Eckerle actively prevents infringements of human rights and eliminates such infringements as part of the human rights due diligence process. Eckerle works to ensure that the personal rights of all people associated with the company are respected.

1.7. Diligence in Handling Business Assets

Eckerle and its employees handle company assets carefully and responsibly.

This includes tangible assets such as buildings, systems and equipment, as well as information technology, software, data and intellectual property.

All employees are responsible for using the resources, equipment and information entrusted to them exclusively in the interests of the company's goals. They protect the above from negative influences and keep them in perfect condition.

Employees observe and comply with the rules and regulations on the use, application and safety of company assets.

1.8. Proper Accounting and Financial Reporting

Eckerle always adheres to the principles of proper bookkeeping. With correct financial reporting based on this, Eckerle creates trust among its contractual partners and the public.

In accordance with transparency requirements, Eckerle keeps its accounts, records and documentation truthfully, correctly, comprehensively and up-to-date. With the publication of its financial statements, which are prepared in accordance with international accounting standards, Eckerle regularly provides information for the relevant stakeholders.

To ensure proper financial reporting, Eckerle has set up an internal control system that regulates and monitors risks through effective control activities, thus ensuring the sustainable creation of added value.

1.9. Appropriate Public Image

Eckerle expects its employees to not make any public statements on behalf of the company, but to instead always refer inquiries to the management of Eckerle Holding. Eckerle takes a positive view of the use of social media networks by employees and respects the right to freedom of expression. When expressing opinions in public, employees must pay attention to accepted standards of courtesy and maintain a respectful tone.



2. CONDUCT TOWARD BUSINESS PARTNERS AND THIRD PARTIES

2.1. Fair Competition

Eckerle stands for fair and undistorted competition. Eckerle and its employees observe and follow the antitrust laws of the markets in which the company operates and upon which Eckerle's economic activities can impact.

In almost all countries there are laws and regulations that prohibit agreements, understandings and coordinated behavior between competitors, suppliers, buyers and dealers that are expressly designed to restrict competition or that have the potential to cause such an effect. The same applies to the abusive exploitation of market power through unilateral conduct.

Eckerle expects its employees not to engage in anti-competitive or antitrust practices.

2.2. Anti-corruption

Eckerle does not tolerate any form of corruption. Both employees and business partners alike are prohibited from practices that might give the impression of the improper influencing of business decisions. Eckerle wishes to avoid even the appearance that business decisions or economic success depend on any form of recompense.

Gifts, Invitations and Other Benefits

Benefits such as gifts, invitations or other perks are only permitted if they are appropriate and transparent. Giving and receiving any form of advantage for the purpose of influencing any person in the public or private sector is prohibited. Donations to public officials, government officials or their representatives for the improper promotion of business are not tolerated. The same applies to facilitation payments and indirect donations, for example those performed via business partners or other third parties. Facilitation payments are small non-mandatory payments made to government officials to expedite routine official actions to which a person is generally already entitled.

All Eckerle employees must therefore comply with the applicable anti-corruption laws in the countries in which Eckerle operates.

Donations and Sponsorship

Eckerle is aware of its social responsibility. Regarding donations, charitable commitment is encouraged within the scope of the available opportunities. No

donations are made to political parties, their representatives, politicians and elected officials or candidates for political office, or to private individuals.

Sponsorship activities are used to give Eckerle a lasting positive impact in the public eye.

Caution should be exercised when offering donations and dealing with requests for sponsorship, as such donations can also be construed as (covert) bribery. Every donation and sponsorship activity must therefore comply with Eckerle's provisions and internal regulations, and all require separate approval by management and, if necessary, shareholders.

2.3. Prevention of Money Laundering and Terrorist Financing

Eckerle complies with its legal obligations to combat money laundering and the financing of terrorism, and the company does not engage in, facilitate or tolerate any activities related to money laundering and the financing of terrorism. Every employee is required to report financial transactions that could give rise to suspicion of money laundering to the management or shareholders.

2.4. Taxes and Duties

Eckerle undertakes to comply with all applicable tax laws and customs regulations and does not pursue any inappropriate tax avoidance strategies.

Eckerle is aware of the company's social responsibility and the need for public finance, and is willing to pay an appropriate amount of tax based on the performance of the Eckerle Group both domestically and abroad.

Cooperation with the financial authorities is open and respectful.

2.5. Export Control and Sanctions

National and international laws and regulations regulate imports and exports, as well as trading, brokerage and financing transactions, the provision of services, and the transfer of goods (products, software and technology). The company uses appropriate processes to ensure that transactions and activities, both with third parties and within the Eckerle Group itself, do not violate the laws regarding export control and sanctions.

3. DATA AND INFORMATION HANDLING

3.1. Digitization

Eckerle considers digitization to be a strategic corporate task and recognizes that modern information technologies such as the cloud, artificial intelligence, the Internet of Things or digital twins offer a wide range of opportunities and potential. Digital solutions, such as the automation of business processes, additional information gains from structured and unstructured data, and networking within the company and with external stakeholders, enable Eckerle, its employees and customers to open up opportunities along the entire value chain.

Eckerle handles data responsibly. Digital solutions are promoted in a sustainable and value-oriented manner. For all internal and external digital solutions, Eckerle always ensures the highest possible level of cyber security.

3.2. Protection of Company-relevant Information

Eckerle protects company-relevant information from misuse, loss, destruction and manipulation. To this end, we apply relevant security standards and take appropriate confidentiality measures.

This applies not only to our own company information, but also to confidential information with which Eckerle has been entrusted by its business partners.

Information and cyber security is given high priority at Eckerle, and is geared toward the continuous improvement of ensuring the protection goals of confidentiality, availability and integrity. An information security management system forms the framework for this.

3.3. Protection of Personal Data

Eckerle protects and respects the personal rights of its employees and business partners. Appropriate measures are taken to ensure compliance with the applicable regulations and laws, particularly when dealing with personal data.

3.4. IT Security

At Eckerle, IT systems are designed with a high IT security standard. By means of the technical and organizational IT security measures implemented, the processed company data, as well the data of employees and business partners, is protected as well as possible and always in accordance with the law.

3.5. Inside Information

Inside information, i.e. specific information that would be likely to have a significant impact on the price of listed securities were it to be made public, must be treated as strictly confidential. Managers and employees who have access to such inside information are obliged not to use it for trading in securities or other financial instruments, not to pass it on to third parties, and not to make recommendations to buy or sell securities or other financial instruments.

4. DEALING WITH EMPLOYEES AND COLLEAGUES

4.1. Fair Working Conditions and Employee Development

Eckerle is committed to the standards of the eight ILO core labor standards; the company recognizes the right of its employees to appropriate remuneration and adheres to the legally guaranteed minimum wages in the respective labor markets. Eckerle follows the applicable labor law regulations in all of its companies. Maximum working hours are observed. Eckerle satisfies employees' statutory entitlements to minimum annual leave.

The company expects its business partners (particularly personnel service providers) to respect the right of their employees to fair wages, and to observe Eckerle's values and principles of conduct in dealing with one another. At Eckerle, we focus on our employees and on cooperation which is founded on trust. We see the development of our employees as an investment in both the future of each individual and the competitiveness of our company.

We offer a comprehensive range of development and career opportunities in order to shape the future of Eckerle together with our employees. Every member of staff is offered the opportunity to develop according to their individual skills and professional and personal interests. Lifelong learning, i.e. learning through experience, from each other and on training courses, is valued and encouraged in the interests of being and remaining innovative and successful. Management plays a central role here in order to harmonize the interests of the company with individual needs.

4.2. Work-life Balance

As a global family company, it is particularly important for Eckerle to contribute to the best possible compatibility of family and work through family-friendly arrangements.

By taking the special needs of families into account, Eckerle wishes to increase the satisfaction and motivation of its employees and thus improve the company's performance.

The basis for successful cooperation in the interests of employees and the company is a partnership that is always characterized by trust and transparency.

4.3. Diversity and Equal Treatment

Eckerle is committed to a respectful, prejudice-free working environment in which diversity is seen as a success factor. Everyone should be valued, regardless of age, gender, gender identity, ethnic or social background, nationality, religion or belief, disability, or sexual orientation.

Eckerle appreciates multicultural experiences and diversity, and sees them as the strengths of a global organization. As such, we respect one another and strive for a working environment that actively embraces inclusion and is free from discrimination, intimidation and harassment.

4.4. Dialogue with Employees and Employee Representatives

Eckerle respects the right of its employees to freedom of association and grants them the right to conduct collective bargaining in order to determine working conditions. Eckerle works together with employee representatives in a trusting and constructive manner. Irrespective of this, Eckerle always enables its employees to express their concerns directly by ensuring that they have free access to management-level personnel.

4.5. Rejection of Forced and Child Labor

In its business activities, Eckerle categorically rejects any form of child labor, forced and compulsory labor, modern slavery, involuntary or exploitative prison labor, human trafficking and other forms of exploitation. Eckerle also emphatically demands an identical standpoint from its business partners.

5. SUSTAINABILTY, ENVIRONMENT, HEALTH AND SAFETY

5.1. Sustainability

Sustainability is firmly anchored in the values and actions at Eckerle. Regarding our products, their manufacture, and the supply chain alike, sustainable value creation is based on economic, ecological and social responsibility. Eckerle therefore sees sustainable action as a cross-sectoral issue that is relevant in all areas of the company.

Eckerle is part of the GoZero project of the Prettl Group, with the goal of becoming CO₂ neutral by 2025.

Employees make an active contribution by aligning their conduct with social values and aligning their daily actions with minimizing the consumption of resources and contributing to the further development of all relevant sustainability issues. Eckerle maintains a comprehensive Environment, Health and Safety management system at all production sites worldwide. The company attaches great importance to health protection, safety, and compliance with local environmental protection laws and international regulations. Eckerle works with its business partners to ensure that they recognize and accept their responsibility for environmental and climate protection, health protection, and occupational safety.

5.2. Environmental and Climate Protection

The protection of the environment is an integral part of Eckerle's corporate responsibility. This applies to the entire industrial manufacturing process, and to business operations before, during and until the completion of transport, disposal and recycling. By using environmentally-friendly processes at all locations, the environmental impact is reduced to a minimum and environmental protection is continuously improved. To ensure environmental standards are implemented, our internal systems ensure safety, management and measurability.

Employees share responsibility in all their activities, for example in reducing energy and water consumption, greenhouse gas emissions, and waste. The principle of the circular economy is the basis of all our actions – from the design of our products through their manufacture and the extension of their service life to recycling.

The product portfolio of the Eckerle Group also focuses on solutions for emission-free mobility. Eckerle supports the expansion of the generation of renewable energy. Together with its customers, the company thus actively contributes to social change by designing technologies that are both environmentally and climate-friendly.

5.3. Health and Safety at Work

Eckerle provides a safe working environment for its employees by meeting or exceeding the relevant legal requirements, regulations or corporate policies with regard to occupational safety and active health protection. We believe that occupational illnesses and accidents at work are basically avoidable. Eckerle actively implements measures aimed at reducing the number of work accidents and their severity. In addition, Eckerle maintains and promotes the physical and mental health of its employees. Managers in particular have a responsibility to ensure that appropriate health and safety precautions are taken. A key focus is on employees who may be particularly vulnerable, such as young people, pregnant women and people with reduced abilities. Such groups are safeguarded from tasks which may harm their health or safety.

GOZERO
PRETTL

OUR PATH TO CO₂ NEUTRALITY

we are
ECOPRENEURS

LEADER



ECKERLE

6. NOTIFICATION, INFORMATION AND CONTACT PERSONS

In order to ensure the company's continuous improvement, the management of the Eckerle Group wishes to address violations of this Code, and welcomes any comments, complaints or feedback regarding it.

Whistleblowers are assured that they need not fear retribution.

Information may be communicated anonymously by regular mail or by email.

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